

**REMARKS**

Claims 1, 4-11 and 13-16 are all the claims pending in the application. Claims 2, 3 and 12 have been canceled without prejudice or disclaimer. The subject matter of claims 2 and 3 have been incorporated into claim 1. Thus, Applicants respectfully request that these amendments be considered even after the Final Office Action.

**Information Disclosure Statement**

Applicants thank the Examiner for returning initialed a copy of the PTO/SB/08 form for the Information Disclosure Statements (“IDS”) filed December 7, 2005, thereby indicating that the references listed thereon have been considered.

The Examiner also returned a copy of the PTO/SB/08 form for the IDS filed October 6, 2005, but crossed out the listed references, rather than initialing them. In a telephone call from the Examiner, the Examiner indicated that she did not initial these references because no translation for the foreign language documents was submitted with the IDS. However, Applicant submitted a copy of the corresponding Japanese Office Action and an English translation of the pertinent portions thereof which cites such documents and indicates the degree for relevance found by the foreign office in order to comply with the concise explanation requirement under 37 C.F.R. § 1.98(a)(3). Therefore, Applicant has complied with the concise explanation requirement and respectfully requests that the Examiner consider the references of the October 6 IDS and return an initialed copy of the PTO/SB/08 form.

**Claim Rejections - 35 U.S.C. § 112**

Claim 13 stands rejected under 35 U.S.C. § 112, first paragraph. Applicants respectfully traverse this rejection. The non-limiting embodiment of Fig. 10 teaches that the package pins include option pins for operating the semiconductor chips 11, 12 independent from one another and regular pins used for both semiconductor chips. The written description requirement with respect to claim 13 is satisfied at least by this disclosure of regular pins being considered and additional option pins. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection of claim 13.

**Claim Rejections - 35 U.S.C. § 103**

**Claims 1-3 and 12-14**

Claims 1-3 and 12-14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Inaba (U.S. Patent Application Publication No. 2001/0040793) in view of Forthun (U.S. Patent No. 6,473,308). Applicants respectfully traverse.

Claim 1 recites package pins arranged in a pattern identical to the predetermined pattern. The Examiner acknowledges that Inaba fails to disclose such a feature, but asserts that Forthun teaches package pins arranged in an identical pattern to the predetermined pattern of the chip pins. However, the Examiner's alleged motivation for modifying Inaba with Forthun is deficient.

The Examiner asserts that Forthun teaches that providing package pins identical to the predetermined pattern aids in providing a connection among components. However, the Forthun reference is not applicable to Inaba. Inaba teaches multiple semiconductor chips 3 mounted to a

single substrate 2. Thus, all of the chips are mounted directly to the same substrate. In contrast, Forthun is directed to an individual substrate for each chip (*see* Fig. 9). The patterns in Forthun must be identical to facilitate the stacking of multiple packages 10, each package 10 including a single chip and substrate. Since Inaba only has a single substrate, it does not require Forthun's solution for stacking multiple chip packages. The solution of Forthun is simply not applicable to the single substrate design of Inaba. Accordingly, one of ordinary skill in the art would not have been motivated to modify Inaba with Forthun as suggested by the Examiner and Applicants respectfully request that the Examiner withdraw the rejection based on Inaba and Forthun.

#### **Claims 15 and 16**

Claims 15 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Inaba in view of Forthun and Matsuura et al. (U.S. Patent Application Publication No. 2003/0080438). Applicants respectfully traverse this rejection.

Claims 15 and 16 depend from claim 1. As discussed above, one of ordinary skill in the art would not have modified Inaba with Forthun as suggested by the Examiner, and therefore, this combination of references is deficient with respect to claim 1. Matsuura does not correct the deficiencies of the combination of Inaba and Forthun with respect to claim 1. Accordingly, claims 15 and 16 are allowable at least by virtue of their dependency.

#### **Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

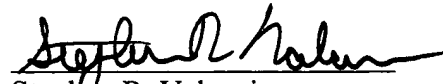
AMENDMENT UNDER 37 C.F.R. §1.116  
EXPEDITED PROCEDURE  
U.S. APPLN. NO. 10/787,127

DOCKET NO. Q80142

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Stephen R. Valancius  
Registration No. 57,574

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: June 13, 2006